

## REMARKS

Claims 1-2, 4-11, and 13-21 are now pending in the application. Claims 1-2, 4-11, 13-17 stand rejected. Claims 3 and 12 have been previously cancelled. Claims 18-21 were previously withdrawn from consideration. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the remarks contained herein.

## REJECTION UNDER 35 U.S.C. § 102

Claims 1, 4, 6-7, 10, 13 and 16 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Nakagawa et al. (U.S. Pat. App. No. 2002/0197869; hereinafter "Nakagawa"). This rejection is respectfully traversed.

Initially, Applicant notes that Nakagawa appears to disclose a water-based resist stripping liquid management system that includes a bath 1 for providing a stripping solvent via a pipeline 10 to a sprayer 7. The sprayer 7 sprays the solvent on substrates 6 that pass beneath the sprayer 7 on a roller conveyer 5. In contrast to Nakagawa, independent Claim 1 has been amended to recite:

removing an amount of resin from the object by  
**submersing the object in the liquid in the storage device**  
in a manner such that the amount of resin becomes dissolved in the liquid and thereby increases the ratio of the dissolved resin to the solvent of the liquid, the increase of the ratio altering an electrical characteristic of the liquid...(emphasis added).

Independent Claim 10 has been amended to recite:

removing an amount of resin from the object by  
**submersing the object in the liquid in the storage device**  
such that the amount of resin becomes dissolved in the

liquid and thereby alters the electrical characteristic of the liquid...*(emphasis added)*.

Independent Claim 17 has been amended to recite:

removing an amount of material by **submersing the object in the liquid in the storage device** such that the amount of material becomes additional solute in the liquid and thereby increases the ratio of the solute to the solvent of the liquid, the increase of the ratio altering an electrical characteristic of the liquid the liquid comprising Tripropylene Glycol Methyl Ether...*(emphasis added)*.

In view of the above discussion, Applicant respectfully asserts that Nakagawa does not teach, suggest or disclose each and every element of Claims 1, 10 and 17. In this regard, Nakagawa does not teach, suggest or disclose removing an amount of resin from an object by submersing the object in the liquid in the storage device. Rather, Nakagawa only teaches **spraying** a substrate with a stripping liquid from a sprayer with the liquid provided from a bath, and does not teach, suggest or disclose whatsoever **submersing the object in the liquid in the storage device**. Nakagawa merely discloses that the substrates are sprayed with a liquid to remove the resist and metal oxides from the top layer of the substrate, which is substantially different than submersing an object in the liquid to remove a resin.

The Office states that "the stripping liquid sprayed onto the surface of the substrate treated does not replenish the bath (the bath under the conveyor) all at the same time" and that "at a given period of time the resist stripping fluid is present above the surface of the substrate i.e., the substrate (object) is submersed in the resist stripping fluid" on the conveyor surface. Applicant respectfully notes that this does not teach, suggest or disclose whatsoever the submersing of an object in a liquid **in the storage device**, and thus, Nakagawa cannot anticipate Claims 1, 10 and 17. Applicant

further notes that modifying Nakagawa to include submerging an object in a liquid in a storage device would change the principle of operation of Nakagawa, and thus, is improper.

Accordingly, for at least these reasons, Applicant respectfully asserts that Nakagawa does not teach each and every element of Claims 1, 10 and 17, and as such, Applicant respectfully requests the Office to reconsider and withdraw the rejection of Claims 1, 10 and 17 under 35 U.S.C. § 102(b).

With regard to Claims 4, 6, 7, 13 and 16, Applicant notes these claims depend directly or indirectly from either independent Claims 1 or 10, and thus, should be in condition for allowance for the reasons set forth for Claims 1 and 10 above. Accordingly, Applicant respectfully requests the Office to reconsider and withdraw the rejections of Claims 4, 6, 7, 13 and 16 under 35 U.S.C. § 102(b).

#### **REJECTION UNDER 35 U.S.C. § 103**

Claims 2, 5 and 11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakagawa et al. in view of Oberlander et al. (U.S. Pat. No. 6,368,421; hereinafter "Oberlander"). Claims 8, 9, 14 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakagawa et al. in view of Kung (U.S. Pat. App. No. 2004/0160225; hereinafter "Kung"). These rejections are respectfully traversed.

With regard to Claims 2, 5, 8, 9, 11, 14 and 15, Applicant notes these claims depend directly or indirectly from either independent Claims 1 or 10, and thus, should be in condition for allowance for the reasons set forth for Claims 1 and 10 above.

Accordingly, Applicant respectfully requests the Office to reconsider and withdraw the rejections of Claims 2, 5, 8, 9, 11, 14 and 15 under 35 U.S.C. § 103(a).

**CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Office reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of these remarks is respectfully requested. If the Office believes that personal communication will expedite prosecution of this application, the Office is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: 7/20/07

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